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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JENNIE QUAN, individually and as
successor in interest to BENJAMIN
CHIN, deceased,

Plaintiffs,

vs.

COUNTY OF LOS ANGELES;
MARISOL BARAJAS; HECTOR
VAZQUEZ; and DOES 3-10, inclusive,

Defendants.

Case No. 2:24-cv-04805-MCS-KS

Assigned to:

Hon Mark C. Scarsi

Hon. Mag. Judge Karen L. Stevenson

DECLARATION OF HANG D. LE

1 I, Hang D. Le, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California,
3 and the Central District of California. I make this declaration in support of Plaintiff's
4 Opposition to Defendants' Motions for Summary Judgment, or Partial Summary
5 Judgment. I have personal knowledge of the facts contained herein and could testify
6 competently thereto if called.

7 2. Attached hereto as "**Exhibit 1**" is a true and correct copy of the relevant
8 portions of the transcript of the September 25, 2025 Deposition of Hector Vazquez.

9 3. "**Exhibit 2**" is a true and correct copy of the bodyworn camera video of
10 Hector Vazquez, produced by Defendants in the course of discovery, bates stamped
11 COLA 00285. This exhibit is being manually filed.

12 4. Attached hereto as "**Exhibit 3**" is a true and correct copy of Exhibit 1 to
13 the Deposition of Hector Vazquez, which is a screenshot of Detective Vaquez's
14 bodyworn camera video.

15 5. Attached hereto as "**Exhibit 4**" is a true and correct copy of Exhibit 2 to
16 the Deposition of Hector Vazquez, which is a screenshot of Detective Vaquez's
17 bodyworn camera video.

18 6. Attached hereto as "**Exhibit 5**" is a true and correct copy of Exhibit 3 to
19 the Deposition of Hector Vazquez, which is a screenshot of Detective Vaquez's
20 bodyworn camera video.

21 7. Attached hereto as "**Exhibit 6**" is a true and correct copy of Exhibit 4 to
22 the Deposition of Hector Vazquez, which is a screenshot of Detective Vaquez's
23 bodyworn camera video.

24 8. Attached hereto as "**Exhibit 7**" is a true and correct copy of Exhibit 5 to
25 the Deposition of Hector Vazquez, which is a screenshot of Detective Vaquez's
26 bodyworn camera video.

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1 9. Attached hereto as “**Exhibit 8**” is a true and correct copy of Exhibit 6 to
2 the Deposition of Hector Vazquez, which is a screenshot of Detective Vaquez’s
3 bodyworn camera video.

4 10. Attached hereto as “**Exhibit 9**” is a true and correct copy of Exhibit 7
5 to the Deposition of Hector Vazquez, which is a screenshot of Detective Vaquez’s
6 bodyworn camera video.

7 11. Attached hereto as “**Exhibit 10**” is a true and correct copy of the
8 relevant portions of the transcript of the September 26, 2025 Deposition of Marisol
9 Barajas.


10 12. “**Exhibit 11**” is a true and correct copy of the bodyworn camera video of
11 Marisol Barajas, produced by Defendants in the course of discovery, bates stamped
12 COLA 00286. This exhibit is being manually filed.

13 13. Attached hereto as “**Exhibit 12**” is a true and correct copy of Exhibit 13
14 to the Deposition of Marisol Barajas, which is a screenshot of Deputy Barajas’s
15 bodyworn camera video.

16 14. Attached hereto as “**Exhibit 13**” is a true and correct copy of the
17 relevant portions of the transcript of the September 18, 2025 Deposition of Kyle
18 Toves.

19 15. Attached hereto as “**Exhibit 14**” is a true and correct copy of the
20 relevant portions of the transcript of the July 21, 2025 Deposition of Paul V.
21 Gliniecki, M.D.

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23 I declare under penalty of perjury under the laws of the State of California and the
24 United States of America that the foregoing is true and correct. Executed this 13th
25 day of October 2025, in Los Angeles, California.

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Hang D. Le